



**INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
INDUSTRIAL/HAZARDOUS WASTE INSPECTION REPORT**

| | | | | | | | |
|---|---------------------------|---|---|-------------------------|------------|-----------|---|
| Please type/Print Facility Name: | | ESSROC | | | | | |
| Location: | | 3084 West County Road 225 South | | | | | |
| City: Logansport | | County: Cass | | | Zip: 46947 | | |
| Inspector's Name: | | Robert Malone | | | | | |
| EPA Hazardous Waste I.D. # | | Date(s) | | | Time | | |
| IND005081542 | | 9-28-2001 | | | 1:00 p.m. | | |
| A. PRE-INSPECTION REVIEW | | | | | | | |
| I. | File Review | | | | | | |
| Notification Date: | | 10-23-90 | | | | | |
| Notification Activities: | | Large Quantity Hazardous Waste Generator (LQG), TSD (Storage), Used Oil Generator | | | | | |
| Has a Part B Permit Been Issued? | | Yes/No | X | Permit Expiration Date: | | | |
| Permitted Units: | | Tanks 1-5 | | | | | |
| Interim Status Units: | | Tanks 6-10, container and railcar storage | | | | | |
| Post Closure Units | | None | | | | | |
| II. | Compliance History | | | | | | |
| Previous Inspection Date: June 12, 2001 | | | | Complete | | Focused | X |
| | | | | Follow-up | | Complaint | |
| List Unresolved Violations: | | No violations were noted during the June 12, 2001, inspection. | | | | | |
| Comments: This is a focused inspection. Areas inspected include accumulation, container storage, and tank storage. The facility also utilizes cement kilns to burn hazardous waste as a fuel. | | | | | | | |

B. INSPECTION FINDINGS

I. Type and Size of Operation, Products, Processes That Produce Waste (hazardous or non-hazardous).

The facility operates cement kilns to manufacture cement. There are two (2) kilns at the site. Hazardous waste is used as a fuel source for the cement kilns.

II. Regulatory Status/Activity for Hazardous and Industrial Waste (Based on Inspection)

Based on information gathered at the time of the site visit, the facility is a large quantity hazardous waste generator, a storage facility and has interim status as a BIF.

III. Hazardous Waste Streams (including Universal Waste)

| EPA #/Description | Sources/Process | Generation Rate | Disposition |
|---------------------|---------------------------------|---|-----------------|
| F003/F005/D001 | Off-site generators | receive approximately 100,000 gallons per day | burned in kilns |
| F003/F005/D001 | Truck unloading / pump cleaning | 150 gallons per week | burned in kilns |
| multi-coded | parts washer | approximately 50 gallons per month | Safety Kleen |
| lead acid batteries | maintenance | less than 5 batteries per month | NAPA |

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|--|---|-----------------------|---|
| IV. | Exempted/Excluded Hazardous Waste Streams or Units and Reason for Exemption | | |
| cement kiln dust, landfilled on property | | | |
| V. | Transporter(s) Used (Include both Industrial and Hazardous Waste Transporters) | | |
| Safety Kleen PCII Ozinga Tri State Trucking | | | |
| VI. | Non-Hazardous Waste / Industrial Waste / Used Oil | | |
| | Description | Source/Process | Disposition |
| | used oil | maintenance | 300 gallons per month burned on site in kilns |
| | antifreeze | maintenance | varies Safety Kleen |
| | PPE | operations | less than 100 lbs. per month burned on site in kilns |
| | refractory brick | kiln maintenance | varies industrial waste-Cass County Landfill |
| | CKD | production | varies quarry |

| VII. | | Container Management Area(s) (including Used Oil) | | | |
|--|----------------------|---|---|--|----------------------|
| <90(180) Day Accumulation Description of unit | | <90(180) Day Accumulation Description of Unit | | <90(180) Day Accumulation Description of unit | |
| Location: CSB | | Location: maintenance garage | | Location: 90 day area outside fence | |
| Waste Code | #/Size of Containers | Waste code | #/Size of Containers | Waste Code | #/Size of Containers |
| F003/F005 D001 | see attached | used oil | 1-55 gal. cont. one half of a 55 gallon container (approximately 1/2 full) | F003/F005/D001 | 14-5 gallon cont. |
| VIII. | | Satellite Accumulation Area(s) / Universal Waste Accumulation Area(s) | | | |
| Location | | Waste Code(s)/Process | | Comments | |
| unloading area | | F003/F005/D001 | | properly closed and labeled | |
| pump area | | F003/F005/D001 | | properly closed and labeled | |
| universal waste accumulation area | | fluorescent lamps | | fluorescent lamps now properly labeled | |

| IX. | Hazardous Waste/Used Oil Tanks | | |
|--|--------------------------------|--------------|------------------------|
| Waste Codes/Location | Type/Construction | Size | Quantity On-Site |
| used oil/maintenance garage | above ground steel | 300 gallons | approximately 1/2 full |
| Tanks 1-10 (hazardous waste tank storage area) | above ground steel | see attached | see attached |
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| XI. | | Company is subject to the following regulations | | | |
| | | 40 CFR 261.5 / 329 IAC 3.1-6 Conditionally Exempt Generator | | | |
| X | | 40 CFR 262 / 329 IAC 3.1-7 Generator Standards | | | |
| | | 40 CFR Part 263 / 329 IAC 3.1-8 Transporter Standards | | | |
| X | | 40 CFR Part 264/265 / 329 IAC 3.1-9 & 10 Facility Standards | | | |
| | X | 40 CFR Subpart I Container Standards | | | |
| | X | 40 CFR Subpart J Tank Standards | | | |
| | | 40 CFR Subpart AA Air Emission – Process Vent | | | |
| | X | 40 CFR Subpart BB Air Emission – Equipment Leaks | | | |
| | X | 40 CFR Subpart CC Air Emission – Tanks, Surface Impoundments & Containers | | | |
| | | Other (specify): | | | |
| | | 40 CFR Part 266 / 329 IAC 1-11 (specify): | | | |
| X | | 40 CFR Part 273 / 329 IAC 3.1-16 & Universal Waste | | | |
| X | | 329 IAC 13 Used Oil Management | | | |
| | | 327 IAC 2-10 Secondary Containment Rule | | | |
| | | 329 IAC 9 Underground Storage Tank Rule | | | |
| | | IC 13-20-7.5 Industrial Waste Law | | | |
| | | Other (specify): | | | |
| XII. | | Additional Comments (Include Non-Program Violations) Include information regarding how the company is complying with the notification requirement of IC 13-20-7.5 for Industrial Waste. | | | |
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| XIII. | | Please list guidance materials provided to facility: | | | |
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| XIV. | Narrative / Description of Violations | |
| Facility Name: ESSROC Cement | | ID#: IND005081542 |
| Address: 3084 West C.R. 225 South, Logansport, Indiana | | Inspection Date: September 28, 2001 |
| <p>The Indiana Hazardous Waste Rules, 329 IAC 3.1, incorporates by reference federal standards, which have been published in the Code of Federal Regulations as 40 CFR 260 through 40 CFR 270. Citations reference the federal rules as incorporated, except where the State rule substitutes full text language, in which case the specific 329 IAC 3.1 citation will be used. If the facility has been issued a permit, specific permit conditions may be cited.</p> | | |
| Regulatory Citation | Violation Observed/Suggested Correction and Compliance Date | |
| 329 IAC 3.1-4-3 | <p>Pursuant to 329 IAC 3.1-13-4-3(d)(1), containers of used oil shall be marked or labeled with the words "used oil". Based on information gathered by the Department, one container of used oil in the maintenance garage was not marked with the words "used oil".</p> | |
| Action | <p>Label the used oil container with the words "used oil". In the future, ensure that all containers utilized to accumulate used oil are marked or labeled with the words "used oil".</p> | |
| | <p style="text-align: center;">REQUEST FOR ADDITIONAL INFORMATION</p> <p>Please submit information for employee Mark Harness, TSD repairman, as to what days and times he worked at ESSROC during the month of September 2001. Review of this information may result in additional violations.</p> <p>In addition, please submit any final report that ESSROC may have received regarding the TDI explosion that occurred at the site in February 1999.</p> | |

**** ATTACH FACILITY MAP WITH LOCATION OF HAZARDOUS WASTE ACTIVITY INDICATED**